

**DENNIS F. MORIARTY, ESQ. (BAR NO. 118110)**  
**KRISTINA L. VELARDE, ESQ. (BAR NO. 199299)**  
**CESARI, WERNER AND MORIARTY**  
360 Post Street, Fifth Floor  
San Francisco, CA 94108-4908  
Telephone: (415) 391-1113  
Facsimile: (415) 391-4626  
**5255-3-2-15**  
Attorneys for Defendants and Counter-Defendants  
Randall Hough, Bill Goichberg, Bill Hall, Randy Bauer,  
Jim Berry, and Karl Kronenberger

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA CHESS  
FEDERATION, INC., an Illinois not-for-profit  
corporation, RANDAL D. HOUGH, an  
individual

Plaintiffs,

v.

SUSAN POLGAR, an individual, GREGORY  
ALEXANDER, an individual, and DOES 1-  
20, inclusive,

Defendants.

SUSAN POLGAR

Counter-Plaintiff,

v.

BILL GOICHBERG, BILL HALL, RANDY  
BAUER, JIM BERY, KARL  
KRONENBERGER,

third party defendants,

RANDALL HOUGH,

Counter-Defendant.

No. 3:08-cv-05126-MHP

**DECLARATION OF BILL HALL IN  
SUPPORT OF THIRD-PARTY  
DEFENDANTS HOUGH, BAUER, HALL,  
GOICHBERG, & BERRY 'S MOTION TO  
DISMISS FOR LACK OF PERSONAL  
JURISDICTION**

Date: September 28, 2009  
Time: 10:00 a.m.  
Ctmm: 15, on the 18<sup>th</sup> Floor  
Judge: The Hon. Marilyn Patel

1 I, Bill Hall, declare:

2 The following is of my own personal knowledge, unless stated under information and  
3 belief, and if called as a witness I would testify as follows:

- 4
- 5 1. I am the Executive Director of the United States Chess Federation ("USCF"),  
6 and work as a paid employee. The USCF incorporated within Illinois and  
7 headquartered in the State of Tennessee.
- 8 2. I have resided, as my primary domicile, in Tennessee for the past nine  
9 consecutive years. I have never resided in California.
- 10
- 11 3. I have travelled to California two or three times since 1995 for personal vacation  
12 or other personal activities. I do not have any personal or business dealings in  
13 California.
- 14 4. The USCF does not perform any business in California, with the exception of  
15 dealing with other chess clubs that happen to be located in California and/or  
16 chess tournaments that are held in California. None of these factors occur more  
17 in California than the other states.
- 18
- 19 5. I have traveled to California about four times in relation to USCF business. Such  
20 business activities do not occur in California more than any other state  
21 nationwide. I was not involved in any matters relating to the allegations by  
22 Polgar at issue which would have put me on notice that I may be subject to suit  
23 in California  
24

25  
26 I declare under the laws of the United States of America that the foregoing is true and  
27 correct. Executed at Cumberland County, Tennessee, on August 24, 2009.

28 -2-

  
Bill Hall

## PROOF OF SERVICE

5255-3-2-15

United States District Court – Northern District of California – Case No.: 3:08-cv-05126-MHP

I am a resident of the State of California, over the age of 18 years, and not a party to the within action. My business address is CESARI, WERNER AND MORIARTY, 360 Post Street, Fifth Floor, San Francisco, California, 94108. On August 24, 2009, I served the within document:

**DECLARATION OF BILL HALL IN SUPPORT OF THIRD-PARTY DEFENDANTS  
HOUGH, BAUER, HALL, GOICHBERG, & BERRY'S MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION**

☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

☐ by placing the document(s) listed above in a sealed envelope with postage prepaid, in the United States mail San Francisco, California addressed as follows.

☐ by causing personal delivery by \_\_\_\_\_ of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ by personally hand delivering the document(s) listed above to the person(s) set forth below.

Matt Gonzalez, Esq.  
G. Whitney Leigh, Esq.  
Matt Springman, Esq.  
Gonzalez & Leigh  
Two Shaw Alley, Third Floor  
San Francisco, CA 94105

Karl S. Kronenberger, Esq.  
Kronenberger Burgoyne  
150 Post Street, Suite 520  
San Francisco, CA 94108-4707

(415) 955-1155 (Telephone)  
(415) 955-1158 (Facsimile)

Attorneys for Cross-Claimant: Polgar

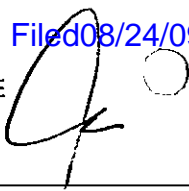
(415) 512-2000 (Telephone)  
(415) 512-2001 (Facsimile)

I am familiar with the firm's practice of processing mail. Under that practice it would be deposited with the U.S. Postal Service on that day with postage thereon prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date/postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury that the above is true and correct.

Executed on August 24, 2009, at San Francisco, California.

PROOF OF SERVICE



ANNAMARIE DAVIS

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